

DATE: April 8, 2004

MEMORANDUM TO: DISTRIBUTION

FROM: SUSAN L. FREY /s/  
DEPARTMENTAL RECORDS OFFICER, IM-11

SUBJECT: RM Numbered Memo 2004-04: STANDARDS FOR FEDERAL RECORDS  
STORAGE FACILITIES

This memorandum serves to remind you that there are construction, maintenance and operation requirements for facilities that store Federal Records that will take effect on October 1, 2009. These requirements were previously published under numbered memo RM 2003-02, "Records Storage Requirements". In addition NARA's requirements, "The Facility Standards for Records Storage Facilities" (Sub-Part K of 36CFR1228), can be found on NARA's web site at:

[http://www.archives.gov/about\\_us/regulations/subchapter\\_c.html/part\\_1228\\_k.html](http://www.archives.gov/about_us/regulations/subchapter_c.html/part_1228_k.html)

These requirements apply to both new facilities and existing records storage facilities with records storage capacity of greater than 25,000 cubic feet. If the volume of the records storage areas in a facility is more than 250,000 cubic feet, there must be a fire barrier between the storage bays so that no one bay exceeds 250,000 cubic feet. Any "Office" space should be separated from the records storage bays. Specific industry standards are included by reference in the NARA regulations, especially the National Fire Protection Association (NFPA), American National Standards Institute (ANSI), and the Underwriter's Laboratory (UL) standards.

In general, provisions will need to be made for the following:

- Fire Protection and Fire Detection systems,
- 2 hour Fire Barriers between adjacent records storage bays, and 4 hour fire protection for structural members and separating the entire storage area from combustible materials (building heating for example),
- Drainage (and sump pumps) supporting a maximum credible water influx based on location and building services in the vicinity,
- Air conditioning & heating (Temperature and Humidity controls),
- Security barriers and alarms appropriate to the classification of the records,
- Limitations on equipment and piping in the records areas to reduce the possibility for fire or water damage,

The Sub-Part also discusses the requirement that the facility be certified by NARA prior to use and the inspection process for that certification. While waivers may be granted by NARA for exceptions to these requirements for existing facilities, it is anticipated that these will be difficult to obtain and that the justification for the waiver request should be submitted as soon as it is realized that it will be needed. **Please submit these waiver requests through HQ Program Management (the Program Records Official) to the Departmental Records Officer.**

As always, records may be sent to a Federal Records Center or to a commercial Records Storage Facility in lieu of modifying existing facilities or constructing a new facility to these requirements. If your site selects the option of using a commercial Records Storage Facility, documentation of the ability of that facility to meet the Sub-Part K requirements must be submitted to NARA **through this office** 45 days prior to the first records transfer.

Please evaluate your records storage facilities against the requirements of 36 CFR 1228, Sub-Part K and **provide a written response to this office by October 1, 2004 related to the ability of your facilities to meet these requirements by FY2009.** If you have questions on this numbered memo, please contact me at [susan.frey@hq.doe.gov](mailto:susan.frey@hq.doe.gov) or Sharon Evelin at [sharon.evelin@hq.doe.gov](mailto:sharon.evelin@hq.doe.gov).